

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JUUL LABS, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-00715-LO-IDD

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

**DECLARATION OF MONICA RIVA TALLEY IN SUPPORT OF
PLAINTIFF'S MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER**

I, Monica Riva Talley, hereby declare as follows:

1. I am an attorney with the law firm Sterne Kessler Goldstein & Fox PLLC, counsel for Plaintiff Juul Labs, Inc. ("Plaintiff").
2. I am a member in good standing of the Bar of the Virginia. My Virginia State Bar number is 41840.
3. I submit this Declaration in support of Plaintiff's Motion to Extend the Temporary Restraining Order and make this Declaration based on my personal knowledge.
4. Since receiving the Temporary Restraining Order, Plaintiff has been working diligently to ensure compliance with its terms by PayPal.
5. On June 13, 2019, PayPal complied with the TRO, and froze the PayPal accounts associated with the Defendants.

6. Since June 13, 2019, Plaintiff has been diligently working to find the physical locations of the Defendants using the information provided by PayPal, as well as the shipping information provided by Defendants.

7. Using the information provided by PayPal, we learned that a number of the Defendants are Chinese and appear to reside and conduct business in China. This discovery has caused some additional delays in locating valid addresses for the Defendants in this case.

8. If we are unable to obtain valid United States addresses for the Chinese Defendants, effectuating service on these Defendants by email may be our only viable option for contacting the Defendants and providing them with adequate notice.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: July 8, 2019

Respectfully submitted,

/s/ Monica Riva Talley
Monica Riva Talley

Attorney for Plaintiff